

Thank you for the opportunity to comment on RM-10870, the National Conference of Volunteer Examiner Coordinators petition for restructuring of the Amateur Radio Service/

Although I am Chairman of the Question Pool Committee (QPC) of the National Conference of Volunteer Examiner Coordinators (NCVEC), my comments are personal and do not necessarily represent those of the QPC or the NCVEC. However, they are based on my experience as a member of the QPC since 1996 and as chair since August 2000. I have absolutely no financial or pecuniary interest in any aspect of the Amateur Radio Service including testing or the preparation of testing or training materials.

**1. Element 1 (CW) Testing:** I concur with the petition, the commission should drop all CW testing requirements for any Amateur Radio Service license. Morse code has a long and distinguished history in Amateur Radio, but technology is an ever evolving entity. The original purposes for CW testing are no longer required from an operational or regulatory standpoint. Sending a message at five words per minute is excruciatingly slow means to convey a meaningful message and is hardly demonstration of proficiency in Morse code. In my opinion it does not represent a level of achievement that the commission should recognize as a requirement for an Amateur Radio Service license at any level, just as the international community no longer requires such a demonstration.

As the international treaty Morse code requirement is *passé*, the Americans with Disabilities Act (ADA) comes into play. The whole issue of “reasonable accommodation” for a disability becomes an issue. I have already seen individuals at testing sessions seek a wavier to the existing Morse code requirements due to the change in the international treaty. If Morse code is retained the commission will have to adopt procedures to deal with wavier requests. This was a torturous undertaking for the 13 WPM and 20 WPM tests prior to April 15, 2000. This topic consumed more time than any other subject in FCC—VEC—VE communications. It will be equally torturous and consume as much of the Commission’s time for a five WPM test whose only apparent function is to demonstrate proficiency for a single signal communications mode with an old and honorable history.

**2. Title of new entry level license:** I concur with the NCVEC’s approach that the new entry level license should be called Communicator. It then has a title that precludes any confusion with the existing or previous license classes. It should not be called Novice, the potential for confusion with two licenses have the same name yet different privileges are obvious, particularly if present Novices are not automatically converted to Communicator class licensees.

**3. Automatic upgrade of Novice to Communicator, Technicians to General and Advanced to Extra:** I support the automatic upgrade of the various license classes as described in RM-10870 and the ARRL’s RM-10867. Both advocate that existing Technicians be upgraded to General as part of this effort and the existing Technician license be abolished. They advocate an identical process for Advanced to Extra and Novice to Communicator. Prior to 1987 the written examination for Technician and General were the same (Element 3). Since that time the QPC has adjusted the now Element 2 (Technician) and Element 3 (General) Pool to put more emphasis on HF operations in the Element 3 question pool. However, Technician licensees with credit for

Element 1 (Morse code) have HF privileges; therefore the QPC has left some HF operations and propagation questions in the Element 2 pool. Granting existing Technician licensees General licensee privileges and granting existing Novices the new entry level privileges is not granting either class of licensee a set of privileges to which they haven't previously been exposed or examined. This is even truer for Advanced Class licensees upgraded to Amateur Extra, where the differences are in frequency privileges within the same bands. The material in the former Element 4A (Advanced) question pool has been incorporated into the current Element 4 (Extra) question pool. The amateur service has no recurring examination requirement; instead it relies on the initiative of the licensee to maintain currency on those items already tested and to obtain proficiency on new modes, techniques and methods by self study. We presently do not require additional testing when a new mode (e.g., PSK31) or operating technique evolves. We expect under the self-policing and self-study concepts of this radio service that an individual will achieve proficiency in new (to them) techniques prior to operating. I see no reason not to rely on this same expectation in the case of the proposed automatic upgrades.

As chair of the Question Pool Committee, I have probably spent more time than any other member of the Amateur Radio Service performing in-depth analysis and study of the syllabus and the individual questions in all three question pools. The differences in the content of the various question pools are not that profound. Individuals who would receive new privileges due to a proposed automatic upgrade have already been tested to some degree on the additional privileges they would receive. Numerous publications already exist and are widely available to assist a ham in exploring his/her new privileges. The entire tradition of "Elmering" within the Amateur Radio Service is an example of the assistance available within the Amateur community. In short, additional testing is not required for these upgrades. As suggested in the petition, the commission can print a new license document in the new (upgraded) class when the license is renewed or modified, but grant the additional privileges to all upon adoption of the petition.

**4. Call sign assignment for the Communicator license:** RM-10870 addresses this issue in passing but takes no position. I would urge the commission to continue its present call sign assignment structure. The communicator licensee should not have a call signs format that is unique to only his/her class of license. To do so would "ghettoize" the new licensee. Unfortunately some amateur operators have been extremely rude to new licensees, with comments such as "Your not a real ham", etc. after previous restructuring activity. I realize that some old timers recall their youth, and their eagerness back then to change their WN#XXX call to W#XXX, they perceive as an incentive for today's Communicator to upgrade, but the world has changed and there is no requirement that a Communicator licensee ever upgrade. We definitely do not want to create a situation where new Communicators are discouraged from participating in the Amateur Radio Service; such a result would mean a failure of this entire restructuring effort.

Respectfully submitted

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